UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GLORIA D. WISEMAN,

PLAINTIFF,

v.

ING GROEP, N.V., VOYA FINANCIAL, INC., AND RELIASTAR LIFE INSURANCE COMPANY OF NEW YORK,

DEFENDANTS.

No. 1:16-CV-07587 (AJN)

RULE 7.1 CORPORATE DISCLOSURE STATEMENT BY RELIASTAR LIFE INSURANCE COMPANY OF NEW YORK

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, undersigned counsel for ReliaStar Life Insurance Company of New York, hereby states that it is a wholly owned subsidiary of ReliaStar Life Insurance Company, which in turn is a subsidiary of Voya Holdings, Inc., which in turn is a wholly owned subsidiary of Voya Financial, Inc., a publicly traded company that does not have a parent corporation, and no public corporation owns more than 10% of Voya Financial, Inc.'s stock.

Respectfully submitted,

Dated: November 23, 2016 Louisville, Kentucky

/s/ Michael T. Leigh

Michael T. Leigh

Clark C. Johnson (pro hac vice forthcoming)
Jeffrey S. Moad (pro hac vice forthcoming)

Louisville, KY 40202-3352

Tel: (502) 587-3400

Email: mleigh@stites.com

cjohnson@stites.com jmoad@stites.com

Andrew D. O'Toole O'Toole + O'Toole PLLC 22 Valley Road Katonah, NY 10536

Tel: (914) 232.1511

Email: aotoole@otoolegroup.com

Counsel for Voya Financial, Inc. and ReliaStar Life Insurance Company of New York

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2016 I served the foregoing document on all counsel of record through CM/ECF, and on the following by email:

Baruch S. Gottesman, Esq. Horowitz & Rubenstein LLC baruchesq@yahoo.com Counsel for Plaintiff

Aryeh Kaufman, Esq. Law Office of Aryeh Kaufman aryeh@akaufmanlegal.com aryehkaufmanesq@gmail.com Counsel for Plaintiff

/s/ Michael T. Leigh

Counsel for Voya Financial, Inc. and ReliaStar Life Insurance Company of New York